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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE  
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897  
Address: 869 N. Cherry St.  
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC No.: WW-8

Date: November 30, 2017  
Time: 9:30 a.m.  
Place: 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13  
Judge: Honorable René Lastreto II

**MOTION FOR AN ORDER LIMITING NOTICE PURSUANT TO 11 U.S.C. §§ 102,  
105(a) AND 901 AND BANKRUPTCY RULES 2002(m) AND 9007**

TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY

JUDGE:

1 Tulare Local Healthcare District, dba Tulare Regional Medical Center ("TRMC"),  
2 the debtor in the above-captioned case, moves the Court (by this "Motion") for entry of  
3 an order establishing notice procedures for this Chapter 9 case. The requested relief is  
4 set out below and the proposed notice procedures are more fully described in the  
5 memorandum of points and authorities filed contemporaneously herewith.

6 **RELIEF REQUESTED**

7 TRMC is requesting an order limiting the notice requirements in its Chapter 9  
8 bankruptcy case. Because TRMC has approximately 750 creditors and parties in  
9 interest and almost 90,000 interested residents, establishing the procedures proposed  
10 by this Motion will serve to streamline the bankruptcy process and reduce the costs of  
11 providing notice, while ensuring that the appropriate parties are kept informed of matters  
12 arising in this case. Therefore, TRMC hereby seeks entry of an order establishing  
13 certain notice procedures which will (1) limit the number of parties upon whom notice  
14 must be served on all matters other than those described in BR 2002(a)(5), (7), (b), and  
15 (f), as applicable; and (2) designate the manner of service as authorized by the  
16 Bankruptcy Code and the Bankruptcy Rules including matters subject to Bankruptcy  
17 Rules 2002, 4001, 6006, or 7004.

18 This Motion is brought pursuant to 28 U.S.C. § 1334 and seeks an order  
19 pursuant to 11 U.S.C. §§ 102(1), 105(a), and 901, FRCP 5(b), BR 2002, and BR 9007.

20 This Motion is based on this Motion; the Memorandum of Points and Authorities  
21 in Support of this Motion; The Declaration of Danielle J. Bethel in Support of this Motion;  
22 on all of the records and documents filed in the above-entitled matter; and on such oral  
23 and documentary evidence as may be presented at the hearings on the Motion.

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1 WHEREFORE, TRMC respectfully requests that the Court enter an order and  
2 prescribe the relief more fully set forth above and for such other relief as the Court  
3 deems just and proper.  
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5 Dated: November 16, 2017

WALTER WILHELM LAW GROUP,  
a Professional Corporation

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8 By: 

Danielle J. Bethel, Attorneys for Debtor,  
Tulare Local Healthcare District, dba  
Tulare Regional Medical Center  
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